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MEMO ENDORSED

ADMITTED TO PRACTICE IN
NEW YORK, PENNSYLVANIA AND
NEW JERSEY

October 12, 2007

By facsimile to (914) 390-4085:

Hon. Charles L. Brieant
Judge, United States District Court
for the Southern District of New York
U. S. Court House
300 Quarropas Street
White Plains, New York 10601

*Application Shorted Conference
of the argument on motion. Now
renewed for 1/17/08 at 9:00 AM.
The Court fixes (Mandate) time under
the Speedy Trial Act. then 1/17/08 for the
reasons set forth in the letter -
to be ordered*

Re: U.S. v. Mario Ramiro Aragon, 07 CR 823 (CLB)

*Charles L. Brieant
10/24/07
USDB*

Dear Judge Brieant:

I write to respectfully request an extension of time to submit defense motions in the above-referenced case to December 5, 2007. I was substituted as new counsel for Mr. Mario Ramiro Aragon on September 19, 2007. I have been advised that Your Honor previously set a motion schedule directing defendant's motions by October 16, 2007. Because of the series of Jewish holidays since September 19th and because I can only communicate with Mr. Aragon with the assistance of a Spanish interpreter, I require additional time to submit defense motions. In addition, I have begun discussions about a possible plea disposition with the government.

AUSA Nola Heller has no objection to the proposed request of December 5, 2007 for defendant's motions, and respectfully asks that the government's motions be due by December 21, 2007, and defendant's reply by January 9, 2008.

I thank Your Honor in advance for your consideration and courtesy.

Very truly yours,

Marilyn S. Reader

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MSR:hs

cc: AUS Nola Heller by facsimile